

EXHIBIT 114

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JOHN P. "JACK" FLYNN	:	
LESLIE A. FLYNN	:	
	:	
Plaintiffs,	:	
	:	
v.	:	<u>Case 1:21-cv-02587-GHW/SLC</u>
	:	
	:	
CABLE NEWS NETWORK, INC.	:	
	:	
Defendant.	:	
-----X		

PLAINTIFFS' SECOND RULE 26(a)(2)
EXPERT DISCLOSURE

Plaintiffs, John P. "Jack" Flynn and Leslie A. Flynn ("Plaintiffs" or the "Flynnns"), by counsel, pursuant to Rule 26(a)(2)(A-B) Fed. R. Civ. Pro. ("FRCP") and § IX of the Case Management Plan [*ECF No. 58*], provide the following Expert Disclosure:¹

Plaintiffs intend to call Dr. Sophia Moskalenko, Ph.D, Psychologist, Security Consultant, UN Office of Counter-Terrorism, International Hub for Behavioral Insights, European Commission Expert (Expert ID: EX2017D316752), as an expert in violent extremism and the psychology of radicalization to provide expert testimony under Federal Rules of Evidence 702, 703 and 705 concerning the issues whether the Flynnns were "QAnon followers" on February 4, 2021, *i.e., adherents to the QAnon belief system*, and whether, in the full context of the July 4, 2020 backyard barbecue, recitation of the phrase "where we go one, we go all" was intended to signify support for QAnon.

¹ This Expert Witness Disclosure is also made on behalf of Valerie Flynn and Lori Flynn, plaintiffs in Case 8:22-cv-00343-MSS/SPF (M.D. Fla.).

A copy of Dr. Moskalenko's written report is attached.

DATED: June 5, 2023

Respectfully Submitted,

JOHN P. "JACK" FLYNN
LESLIE A. FLYNN

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CERTIFICATE OF SERVICE

I hereby certify that on June 5, 2023 a copy of the foregoing was served electronically in PDF on counsel for the Defendant.

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EXPERT REPORT OF DR. SOPHIA MOSKALENKO

June 5, 2023

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Dear Mr. Biss:

On February 4, 2021 and at times thereafter, CNN published an “exclusive” report narrated by correspondent, Donie O’Sullivan (“O’Sullivan”), entitled “*CNN Goes Inside A Gathering Of QANON Followers*”. [<https://www.cnn.com/videos/business/2021/02/05/inside-qanon-culture-meeting-donie-osullivan-pkg-ctn-vpx.cnn> (the “CNN Report”)]. The CNN Report is 3:51 long. It features prominent figures in the QAnon movement, including the “QAnon Shaman” who stormed the United States Capitol on January 6, 2021, Jim Watkins who runs the “hate-filled” website “8kun” where QAnon messages are posted, and Alan Hostetter, whose home was raided by the FBI after the insurrection. The CNN Report contains almost a minute of footage of the violent attacks on the Capitol, and also includes the following clip:



On March 25, 2021, John P. “Jack” Flynn and Leslie A. Flynn (the “Flynnns”), who appear on the far right in the above clip, filed an action in the United States District Court for the Southern District of New York (“District Court”) against Cable News Network, Inc. (“CNN”), alleging false light invasion of privacy.

On August 12, 2022, the District Court entered a Memorandum Opinion and Order in which it ruled as follows:

“The Flynn’s false light claim arose from a report aired by CNN on February [4], 2021 ... The report included a brief clip of the Flynn’s standing next to Lieutenant General Michael Flynn as he proclaimed, ‘where we go one, we go all.’ While the Flynn’s were on screen, the report simultaneously displayed a chyron with the words ‘CNN Goes Inside a Gathering of QAnon Followers.’ The Flynn’s allege that the report placed them in a false light because they are not QAnon followers.

Before the Court can determine whether the Flynn’s plausibly alleged that CNN’s statement was false, the Court must determine the meaning of CNN’s statement that the Flynn’s were QAnon followers. To determine the meaning of an allegedly false statement, the Court must consider the statement ‘in the context of the publication in which [it] appear[s], taken as a whole.’ The Court construes the language ‘in its ‘plain and ordinary sense ... presumed to have [been used] in their ordinary import in the community in which they are uttered or published.’ ‘However, words cannot be isolated from the circumstances in which they are uttered.’ ‘[T]he decisive question is what the person ... to whom the communication was published reasonably understood as the meaning intended to be expressed.’

As Judge Cave identified in the R&R, the word ‘follower’ has numerous meanings. Judge Cave did not expressly address the meaning of CNN’s statement in the context of the report. Instead, Judge Cave concluded that two of the dictionary definitions of the word ‘follower’—‘one that follows the opinions or teachings of another’ and ‘one that imitates another’—were ‘most applicable’ in this case. Judge Cave then concluded that ‘[a]pplying at least two of the dictionary definitions of follower ... the Flynn’s own statements show that they followed the opinions of and imitated QAnon such that CNN’s statement that they were QAnon followers was substantially true....’ The Court declined to adopt this portion of Judge Cave’s analysis. Nothing in CNN’s report suggests that a QAnon follower is someone who merely engages with the movement on Twitter, in the sense that a fan might ‘follow’ their favorite actor. Rather, in the context of CNN’s report, the term QAnon follower would be reasonably understood by a viewer to mean an adherent to the QAnon movement, in the sense that a member of a faith follows its belief system.

The report, which was aired roughly a month after the January 6, 2021 attack on the United States Capitol, focuses on individuals attending a QAnon meeting with ‘prominent figures in the QAnon movement.’ Among other things, the report shows a speaker at the meeting state ‘we are at war right now, and we in this room understand that, very, very much.’ One of the individuals at the meeting, known as the QAnon Shaman, is shirtless, has his face painted, and is wearing a horned headdress and a QAnon flag as a cape. The report states that at least two people at the meeting were in Washington D.C. on January 6, including the QAnon Shaman, who stormed the Capitol. The report interposes footage of the QAnon meeting with violent footage from the January 6 attack. A commentator explains that the people at the meeting ‘felt like they were part of something big and revolutionary and that they were opposing absolute evil’ ... In this context, a viewer would reasonably understand that a QAnon follower is an adherent to the QAnon belief system—including the belief that a high-ranking government insider known as ‘Q’ is exposing a cabal of Satan-worshipping pedophiles which controls the government—not merely someone who read or forwarded tweets about QAnon.”

[08/12/2022 Memorandum and Opinion, pp. 4-6 (citations omitted)].

The District Court also ruled that:

“the Flynns’ tweets ... do not establish that the Flynns are adherents to the QAnon credo. Nevertheless, CNN argues that it was substantially true to call the Flynns’ QAnon followers in light of their Twitter activity.

CNN’s argument places far too much weight on the significance of the Flynns’ social media activity. Crucially, none of the Flynns’ tweets state that they are believers in the QAnon movement. For instance, in one of Jack’s tweets on August 20, 2020, Jack stated ‘I advocate for the Constitution and Bill of Rights. If Q does too~No harm no foul.’ Similarly, after a Twitter user replied to one of Jack’s tweets with a tweet stating, ‘We are with you Jack!’ along with an image of the letter ‘Q’ and the slogan ‘where we go one we go all’ superimposed over an American flag, Jack tweeted, ‘If this means you believe in the constitution and equal justice under the law then this works for me.’ As the Flynns identify in the complaint, while Jack’s tweets ‘embraced the Constitution and equal justice under the law,’ Jack’s tweets do not state that he believes in ‘the dangerous, extremist, racist, anti-Semitic and violent beliefs espoused by QAnon’ The Court cannot assume that Jack believes in every viewpoint held by the QAnon movement merely because Jack tweeted that he shares QAnon’s alleged belief in the Constitution, the Bill of Rights, and equal justice under the law. CNN’s assertion that believing in these principles automatically makes someone a QAnon adherent is simply wrong. A person can believe in certain viewpoints espoused by a movement without believing in all aspects of the movement.

In addition, CNN argues that the Flynns ‘publicized their support for QAnon’ through retweets ... In one example, Jack retweeted a post which stated, ‘Qanon is not a violent conspiracy. We are every day people seeking truth..... Qanon’s, share and tell your story’ ... By relying on the Flynns’ retweets, CNN assumes that the Flynns believed in, and adopted, everything that they retweeted. In essence, CNN is asking the Court to conclude as a matter of law that retweeting a statement is the same as making the statement in the first instance. The Court disagrees. Jack did not make the statement, ‘We are every day people seeking truth.’ He retweeted it. There are many reasons that someone might retweet a statement; a retweet is not necessarily an endorsement of the original tweet, much less an endorsement of the unexpressed belief system of the original tweeter, as CNN would have it....

CNN also places a lot of weight on the July 4, 2020 video that Jack retweeted, in which the Flynns recite the known QAnon phrase ‘where we go one, we go all.’ Yet, in the complaint the Flynns allege that their recitation of the phrase ‘did not signify any kind of support for QAnon’ and that ‘[i]t was not an oath of allegiance to QAnon, or any kind of oath at all.’ The Court takes no position on whether, at a later stage in the case, a factfinder may discredit this allegation. At this stage in the case, however, the Court must accept the Flynns’ factual allegations as true and draw all reasonable inferences in their favor.”

“In sum, the Flynns’ tweets are not sufficient to establish that it was substantially true to call the Flynns QAnon followers. The ultimate question is whether CNN’s statement would have a different effect on the mind of the reader than the pleaded truth. The Flynns allege that QAnon is a “dangerous,” “violent,” “racist,” “extremist,” “insurrectionist,” and “domestic terrorism” movement. As alleged, the Flynns do not share those beliefs and the Flynns’ tweets do not establish otherwise. Accordingly, given the extreme negative connotations of being a QAnon follower, the Flynns have adequately alleged that being labeled a QAnon follower would have a different effect on the mind of a viewer than the pleaded truth.”

[08/12/2022 Memorandum and Opinion, pp. 7-9 (citations omitted)].

In light of the District Court’s rulings, you have asked me to offer an opinion whether the Flynns were “QAnon followers” on February 4, 2021, *i.e.*, *adherents to the QAnon belief system*, and whether, in the full context of the July 4, 2020 backyard barbecue, recitation of the phrase “where we go one, we go all” was intended to signify support for QAnon.

I. Qualifications

I am an expert on violent extremism and the psychology of radicalization. I graduated from Bryn Mawr College in 1999 with a B.A. in Psychology and Mathematics. In 2004, I earned a Ph.D in Social and Clinical Psychology from the University of Pennsylvania. I am a Partnered Faculty member in the Evidence-Based Cybersecurity Research Group, Andrew Young School of Policy Studies, Georgia State University, an Adjunct Professorial Lecturer at American University, and a Programme Management Specialist (Behavioral Insights to Counter Terrorism) at the United Nations Office of Counter-Terrorism. [<https://www.linkedin.com/in/sophia-moskalenko-10b83178>]. My research focuses on the psychology of radicalization, terrorism, martyrdom and disinformation. As a research fellow at the National Consortium for the Study of Terrorism and Responses to Terrorism (NC-START), I conducted research and worked on numerous projects commissioned by the Department of Homeland Security, Department of Defense, Department of State and the Department of Energy to study radicalization and terrorism. [See, e.g., <https://www.start.umd.edu/people/sophia-moskalenko>]. I have presented my work at government briefings, academic conferences, and on television and radio news programs.

In the last ten years, I have authored or played a part in the publication of five (5) books and dozens of white papers, NC-START Reports, research articles, journal articles, discussion points and other materials, including:

- Pastels and Pedophiles: Inside the Mind of QAnon (2021; Independent Publishers’ Award);
- Radicalization to Terrorism: What Everyone Needs to Know (2020);
- The Marvel of Martyrdom: The Power of Self-Sacrifice in the Selfish World (2019);
- Friction: How Conflict Radicalizes Them and Us (2016, David E. Sears Award for Best Book in Political Psychology);
- Friction: How Radicalization Happens to Them and Us (2011);

- Growth opportunities in American and British terrorism research (March 2023, Dynamics of Asymmetrical Conflict);
- QAnon beliefs, political radicalization and support for January 6th insurrection: a gendered perspective (February 2023);
- Fairy Tales in War and Conflict: The Role of Early Narratives in Mass Psychology of Political Violence (February 2023, Peace Review);
- DEADLY DISINFORMATION: LGBTQ CONTAGION NARRATIVES AS RADICALIZING DISINFORMATION IN RUSSIAN PROPAGANDA (January 2023, The Journal of Intelligence Conflict and Warfare);
- <https://tcv.gsu.edu/2022/11/08/in-the-news-dr-mia-bloom-on-qanon-language-and-rhetoric-around-midterm-elections/>;
- Deadly Disinformation: Viral Conspiracy Theories as a Radicalization Mechanism (November 2022, The Journal of Intelligence Conflict and Warfare);
- Predictors of Radical Intentions among Incels: A Survey of 54 Self-identified Incels (September 2022);
- QAnon, Women, and the American Culture Wars (September 2022);
- Secondhand Conspiracy Theories: The Social, Emotional and Political Tolls on Loved Ones of QAnon Followers (August 2022, Democracy and Security);
- Radicalization into QAnon (April 2022, Conference: International Studies Association (ISA);
- <https://newlinesmag.com/first-person/russians-oddly-buy-into-ukraine-conspiracy-theories/>;
- <https://www.psychologytoday.com/us/blog/friction/202201/political-psychology-the-matrix-resurrections>;
- <https://theconversation.com/behind-the-11-oath-keepers-charged-with-sedition-are-many-more-who-have-been-trained-by-the-us-military-175322>;
- <https://tcv.gsu.edu/2023/01/04/dr-mia-bloom-and-dr-sophia-moskalenko-in-disinformed-documentary-by-metrotone-media/>;
- Evolution of QAnon & Radicalization by Conspiracy Theories (November 2021, The Journal of Intelligence Conflict and Warfare);
- <https://www.nbcnews.com/think/opinion/why-qanon-followers-are-opioid-addicts-why-matters-ncna1277323>;
- Bifactor analyses provide uncorrelated measures of activism intentions and radicalism intentions (September 2021, Dynamics of Asymmetric Conflict);
- QAnon as a mental health crisis (May 2021, Emergence: Complexity & Organization);
- <https://www.psychologytoday.com/us/blog/friction/202105/the-four-horsemen-fake-news>;
- <https://academicminute.org/2021/05/sophia-moskalenko-georgia-state-university-qanon-real-and-imaginary-dangers/>;
- Special Correspondence QAnon: Radical Opinion versus Radical Action (April 2021, Perspectives on Terrorism, 15(2), 142-146);
- <https://www.psychologytoday.com/us/blog/friction/202104/the-police-have-radicalization-problem>;
- <https://theconversation.com/many-qanon-followers-report-having-mental-health-diagnoses-157299>;

- Radicalization in the Age of Social Media: Mass Identity Manipulations (MIMs) (February 2021, The Journal of Intelligence and Warfare);
- <https://www.psychologytoday.com/us/blog/friction/202101/what-radicalizes-zip-tie-men>;
- <https://podcasts.apple.com/us/podcast/mia-bloom-and-sophia-moskalenko-on-the-qanon-rabbit-hole/id1448694012?i=1000526644407>;
- <https://www.psychologytoday.com/us/blog/friction/202010/how-much-should-we-rely-2020-election-polls>;
- 2020 radicalization (September 2020, Oxford Research Encyclopedia of Criminology and Criminal Justice);
- <https://www.psychologytoday.com/us/blog/friction/202006/what-do-red-triangle-14-words-and-88-ads-have-in-common>;
- <https://www.psychologytoday.com/us/blog/friction/202006/nobody-said-george-floyd-was-martyr-or-hero>;
- <https://thisviewoflife.com/what-is-radicalization/>;
- <https://www.psychologytoday.com/us/blog/friction/201907/horrific-images-refugees-likely-wont-change-us-policy>;
- <https://www.vox.com/the-highlight/2019/6/25/18716117/chernobyl-evacuated-true-story>;
- <https://www.psychologytoday.com/us/blog/friction/201903/how-could-president-trump-have-inspired-the-nz-shooter>;
- <https://www.psychologytoday.com/us/blog/friction/201901/build-wall-the-radicalizing-power-slogans>;
- <https://www.psychologytoday.com/us/blog/friction/201812/why-americans-fell-russian-internet-trolls>;
- <https://www.psychologytoday.com/us/blog/friction/201812/mass-radicalization-in-the-usa>;
- <https://www.psychologytoday.com/us/blog/friction/201809/powerful-mens-sexual-misconduct>;
- <https://www.psychologytoday.com/us/blog/friction/201807/why-social-media-makes-us-angrier-and-more-extreme>;
- <https://www.psychologytoday.com/us/blog/friction/201805/the-faulty-science-of-patriarchy>;
- U.S. Muslim Opinions about ISIS, the Syrian Conflict and the War in Syria Results of a Spring 2017 Internet Poll of 207 U.S. Muslims (July 2017, START);
- Results of 28 October-8 November 2016 Internet Poll of 216 U.S. Muslims: Opinions about ISIS and the War in Syria; about the 2016 U.S. presidential election; and about the Syrian refugee crisis (May 2017, START);
- Understanding political radicalization: The two-pyramids model (April 2017, American Psychologist 72(3):205-216);
- Tracking radical opinions in polls of U.S. Muslims (January 2017, Perspectives on Terrorism, 11(2):36-48);
- Western Muslims volunteering to fight in Syria and Iraq: Why do they go, and what should we do? (August 2016, Freedom from Fear 2016(11):14-23);

- U.S. Muslim opinion over time: Final report (February 2016, Office of University Programs, Science and Technology Directorate, U.S. Department of Homeland Security);
- The psychology of dictatorship (Aug 2015, Dynamics of Asymmetric Conflict);
- Some Things We Think We've Learned Since 9/11: A Commentary on Marc Sageman's "The Stagnation in Terrorism Research" (Terrorism and Political Violence, 26(4), 601-606) (2014);
- <https://twitter.com/sophiamoskalen1>.

I have not testified as an expert at trial or by deposition in any case in the previous 4 years.

II. Facts and Data Considered

In offering the opinions in this report, I reviewed (a) the CNN Report, (b) the parties' pleadings, including the Flynns' amended complaint, (c) the second amended complaints filed by Valerie Flynn and Lori Flynn in the companion cases pending in Florida, (d) the District Court's memorandum opinions and orders, (d) the Flynns' disclosures and discovery responses, (e) numerous exhibits introduced during the depositions of Donie O'Sullivan, Jack Flynn, Leslie Flynn, Valerie Flynn and Lori Flynn, and (f) transcripts of the depositions of O'Sullivan, the Flynns, and Valerie Flynn.

I am aware that the Flynns have produced voluminous social media data/files. I have not reviewed these files.

The documents provided to me by the Flynns' counsel (Mr. Biss) gave me a full and fair opportunity to examine the issues and to render my opinions stated in this report. This report is submitted pursuant to Rule 26(a)(2)(A-B) of the Federal Rules of Civil Procedure. I reserve the right to supplement this report as necessary.

No exhibits will be used to summarize or support my opinions.

I render all opinions based upon my education, knowledge, belief, training and experience, and to a reasonable degree of certainty.

III. Statement of Opinions and The Bases and Reasons

1. Are the Flynns QAnon Followers?

Following the District Court's direction and definition above, the first question to be answered is what is the QAnon belief system?

"QAnon" is a collection of conspiracy theories, which achieved a sizeable following worldwide.¹

¹ Mia Bloom and Sophia Moskalenko, *Pastels and Pedophiles: Inside the Mind of QAnon* (Stanford University Press, 2021).

The name, QAnon, combines the letter Q, the Department of Energy’s highest security clearance “Q”, and “anon” referencing the anonymity of the original poster. The first “Q-post” (also called “Q-drops”) appeared in October of 2017 on the 4chan site, which hosts discussion boards on a range of topics, from manga to video games and pornography. “Q” implied that the poster was a high-ranking military officer in former president Donald Trump’s inner circle, lending gravitas to the claims. A total of about 5000 Q-drops have appeared to date.² Many of these posts had a central theme of Donald Trump fighting a deep state cabal of Satan-worshipping pedophiles to prevent an impending dystopian future. First appearing on anonymous fringe social media sites, QAnon conspiracy theories spilled over onto more mainstream social media platforms such as Facebook, Instagram, Twitter, and Tik Tok, and “went viral” during the COVID lockdowns. QAnon’s folklore has eventually expanded to endorse conspiracies claiming the 2020 Presidential Election results were fabricated, and that President Joe Biden was actually Donald Trump in a body-suit.

QAnon is a “grass-roots” movement that exists almost entirely online, with no clear authorship for Q-drops, no centralized leadership, no political platform, no headquarters or physical address, and no membership as such.³ As a result, **adherence to QAnon is fully captured in one’s beliefs in QAnon narratives: the only way to be a QAnon follower is to believe in QAnon conspiracy theories.**

The QAnon belief system includes certain core tenets or main views:

- A cabal of Satan-worshipping pedophiles, mainly consisting of elitist Democrats, politicians, journalists, entertainment moguls and other institutional figures, have long controlled the Government.
- Dozens of politicians and A-list celebrities work in tandem with Governments around the globe to engage in child sex abuse. Specifically, Hollywood and Democratic elites take a psychedelic drug called Adrenochrome, derived from torturing children to harvest their oxidized hormonal fear.
- A high-ranking Government insider, known as the “Q Clearance Patriot” or “Q”, has a “plan” and followers should “trust the plan”.

In addition to QAnon’s central tenets, its followers tend to believe in many other conspiratorial narratives, including ideas about 5G networks, COVID vaccines, COVID virus, Lizard-human hybrids, Flat Earth, and Space Lasers.

² PRRI Staff (2022, February 24), “The Persistence of QAnon in the Post-Trump Era: An Analysis of Who Believes the Conspiracies”. <https://www.prri.org/research/the-persistence-of-qanon-in-the-post-trump-era-an-analysis-of-who-believes-the-conspiracies/>.

³ Sophia Moskalenko (2023), “Evolution of QAnon & Radicalization by Conspiracy Theories | The Journal of Intelligence, Conflict, and Warfare,” *The Journal of Intelligence, Conflict, and Warfare*, <https://journals.lib.sfu.ca/index.php/jicw/article/view/3756>, accessed February 22, 2023.

This kind of inclusiveness led researchers and the media to dub QAnon's as an "umbrella conspiracy theory," "big tent conspiracy theory,"⁴ or a "sticky ball of conspiracy theories".⁵

QAnon's ideology often draws on ages-old disinformation narratives. Thus, "blood libel" claims from medieval Europe that accused Jews of stealing Christian children to use their blood for religious ceremonies,⁶ as well as the Protocols of the Learned Elders of Zion—an early 20th century fabrication that claimed to expose a secret worldwide conspiracy by Jews to take over the world and morally and sexually corrupt Gentile children⁷ seem to have inspired QAnon's narrative of a secret world-wide cabal that steals children to drink their blood in Satanic rituals.⁸ Other old conspiracies found a new life in QAnon folklore, including the idea of malicious human-lizard hybrids that would take over the earth, which came from a 1990's U.K. fiction writer and conspiracist David Icke's books,⁹ and spread through the QAnon channels to inspire at least two violent murders, one by a QAnon-believing father who killed his two toddlers,¹⁰ the other by a QAnon-believer who murdered his brother.¹¹ Both killers believed their victims were malicious human-lizard or human-serpent hybrids.

⁴ Rachel E. Greenspan, "The History of QAnon: How the Conspiracy Theory Snowballed from the Fringes of the Internet into the Mainstream," *Insider*, 2021. <https://www.insider.com/qanon-history-who-is-q-conspiracy-theory-what-does-believe-2021-2>.

⁵ Bloom and Moskalenko, *Pastels and Pedophiles*.

⁶ Bloom and Moskalenko; Richard Gottheil, Hermann L. Strack, and Joseph Jacobs, "BLOOD ACCUSATION - JewishEncyclopedia.Com," 2021, <https://jewishencyclopedia.com/articles/3408-blood-accusation>.

⁷ Helen Young and Geoff M. Boucher, "Authoritarian Politics and Conspiracy Fictions: The Case of QAnon," *Humanities* 11, no. 3 (June 2022): 61, <https://doi.org/10.3390/h11030061>.

⁸ Bloom and Moskalenko, *Pastels and Pedophiles*.

⁹ John B. Kachuba, *Shapeshifters: A History* (Reaktion Books, 2019).

¹⁰ Joe Hernandez, "A California Father Claims QAnon Conspiracy Led Him To Kill His 2 Children, FBI Says," *NPR*, August 13, 2021, sec. National, <https://www.npr.org/2021/08/13/1027133867/children-dead-father-claims-qanon-conspiracy-led-him-to-kill>.

¹¹ Danielle Cinone, "Self-Described Proud Boys Member Thought His Brother Was a Lizard — so He Allegedly Killed Him with a Sword – New York Daily News," January 19, 2019, <https://www.nydailynews.com/news/national/ny-news-seattle-man-thought-brother-lizard-killed-him-20190109-story.html>.

Likewise, the idea of Flat Earth, which used to prevail cosmological thinking in medieval times, resurfaced in QAnon narratives as a fact secretly withheld from the public intentionally misled by scientists to believe heliocentric theories that QAnon rejects as false.¹²

Perhaps the most notorious of conspiracy theories associated with QAnon – Pizzagate – originated several years before the first Q-Drops appeared online, claiming that a basement of a pizza parlor in Washington, D.C. was used to hold kidnapped and tortured children.¹³

QAnon also embraces conspiracy theories inspired by current events. Thus, COVID virus became one of the central topics of discussion on QAnon discussion forums, inspiring sometimes contradictory conspiracies about its origins (either as a hoax or as a biological weapon¹⁴) and blaming the government for the pandemic.¹⁵ Similarly, the 5G network, a technological advance of recent years, has been featured in QAnon followers' narratives¹⁶ as a plot to activate microchips from COVID “vaccines” that would then kill or subjugate the vaccinated.

Likewise, QAnon developed a new conspiracy theory that claimed that John F. Kennedy, Jr was still alive and residing in Pittsburgh, and that in fact he might be Q—the source of the original messages (Q-drops) that begat the movement.¹⁷ It seems that conspiracy theories that make it into the QAnon folklore tend to be of political nature and include ideas about malicious actors or entities (the government, science, the media, celebrities) plotting to take control of the U.S. and/or the world.

¹² Karla Resende Da Costa, “SCIENCE AS FEELING: THE EMOTIONS OF THE FLAT EARTH MOVEMENT AND ITS POLITICAL ALIGNMENTS” (MESTRE EM RELAÇÕES INTERNACIONAIS, Rio de Janeiro, Brazil, PONTIFÍCIA UNIVERSIDADE CATÓLICA DO RIO DE JANEIRO, 2021), <https://doi.org/10.17771/PUCRio.acad.53684>.

¹³ Antonis Papasavva et al., “‘Is It a Qoincidence?’: An Exploratory Study of QAnon on Voat” (arXiv, February 14, 2021), <http://arxiv.org/abs/2009.04885>.

¹⁴ Enders, A. M., Uscinski, J. E., Seelig, M. I., Klofstad, C. A., Wuchty, S., Funchion, J. R., Murthi, M. N., Premaratne, K., & Stoler, J. (2021). The Relationship Between Social Media Use and Beliefs in Conspiracy Theories and Misinformation. *Political Behavior*. <https://doi.org/10.1007/s11109-021-09734-6>.

¹⁵ Ho Fai Chan et al., “Early COVID-19 Government Communication Is Associated With Reduced Interest in the QAnon Conspiracy Theory,” *Frontiers in Psychology* 12 (2021), <https://www.frontiersin.org/articles/10.3389/fpsyg.2021.681975>.

¹⁶ *Ibid.*

¹⁷ Manuele Bruzzese, “Fake News and Information Disorder: A Journey through QAnon’s Conspiracy Theory,” Bachelor’s Degree Thesis (Luiss Guido Carli, March 26, 2021), <http://tesi.luiss.it/29522/>; Ellie Crookes, “The Second Coming of King Arthur: Conspiratorship, Embodied Medievalism, and the Legacy of John F. Kennedy,” *Arthuriana* 31, no. 1 (2021): 32–55, <https://doi.org/10.1353/art.2021.0001>.

In short, QAnon is a diverse collection of beliefs which includes some old conspiracy theories recast with new characters, such as politicians, billionaires, and celebrities, as well as new conspiracy theories inspired by technological advances and current political events. QAnon followers are sometimes compared to a virtual cult, adoring and unquestioningly believing whatever disinformation the conspiracy community spins up.¹⁸ Followers make unfounded claims and then amplify them with doctored or out-of-context evidence posted on social media to support the allegations. For instance, followers of QAnon – which has been labeled a domestic terror threat by the FBI – have peddled baseless theories about alien landings, mass shootings and elections. QAnon followers have also falsely claimed that 5G cellular networks are spreading the coronavirus. Many QAnon followers express anti-Semitic views and the Anti-Defamation League (ADL) claims that the movement’s central conspiracy theory – based on the notion of blood libel – includes ancient and dark bias and bigotries in World history.

A December 2020 poll by NPR and Ipsos¹⁹ found that 17 percent of Americans believed that the core falsehood of QAnon — that “a group of Satan-worshipping elites who run a child sex ring are trying to control our politics and media” — was true. The beliefs promoted by QAnon are dangerous. They undermine trust in America’s democratic institutions, encourage rejection of objective reality, normalize disinformation and misinformation, and deepen the nation’s already polarized landscape.²⁰

a. Are the Flynns adherents to any of QAnon’s core beliefs?

Having reviewed the materials provided to me by the Flynns’ counsel (Mr. Biss), I did not find evidence that the Flynns were QAnon followers, that they believed any of the QAnon core beliefs or indeed any of the more “fringe” QAnon conspiracy theories.

In the materials provided, there were no statements by the Flynns that expressed support for the idea of a world-wide Satan-worshipping cabal of powerful pedophiles; there was no expressed support for the idea of Adrenochrome as being sourced from kidnapped and tortured children; no evidence of the Flynns believing in “the Plan” to take over the pedophilic cabal-overrun government via an imminent “Storm.” There was no evidence in the case materials I reviewed that the Flynns believed in human-lizard hybrids; in the Flat Earth idea; in Space Lasers controlled by Jews to burn out California forests; or in COVID vaccine as tracking devices, in JFK, Jr. being alive; etc. What’s more, in several communications dating at or around the time of the backyard barbecue recitation of the phrase “where we go one we go all”, the Flynns made it clear they did not associate themselves with QAnon.

In short, the Flynns were not adherents to the QAnon belief system.

¹⁸ <https://www.bbcselect.com/watch/the-cult-of-conspiracy-qanon/>.

¹⁹ <https://www.ipsos.com/en-us/news-polls/npr-misinformation-123020>.

²⁰ Sophia Moskalenko et al., “Secondhand Conspiracy Theories: The Social, Emotional and Political Tolls on Loved Ones of QAnon Followers,” *Democracy and Security*, August 11, 2022, 1–20, <https://doi.org/10.1080/17419166.2022.2111305>.

2. Was The Backyard Barbecue Recitation An Oath to QAnon?

Can someone recite the phrase “where we go one we go all” for reasons unrelated to QAnon and without intending to be a QAnon follower?

The words “where we go one we go all” make no reference to QAnon or to any of QAnon-associated beliefs. It is, therefore, possible for anyone to recite these words without making a reference to QAnon or QAnon beliefs, simply for their appeal as a catchy phrase with a nice ring to it, and as a call to unity and mutual support. In the absence of any evidence that the Flynns believed QAnon conspiracy theories at the time when they recited the phrase, there is no basis to attribute their recitation of it to their support of QAnon.

On July 4, 2020, did the Flynns intend to pledge an oath to QAnon?

While it is impossible to determine the Flynn’s intentions behind reciting the words “where we go one we go all” at their backyard barbecue, in the context of their previous communications, both on social media and privately, as well as in light of their sworn depositions, I see no evidence that their recitation of those words was meant as a pledge to QAnon.

A believer in QAnon conspiracy theories and a follower of QAnon content online, such as Q-drops, would recognize the pledge the Flynns recited at their backyard barbeque as including QAnon content; however, a person not familiar with QAnon material would take the words in the pledge at their face value, which does not reference QAnon.

Immediately before reciting the phrase in question, the Flynns recited the Oath of Office (*I do solemnly swear (or affirm) that I will support and defend the Constitution of the United States against all enemies, foreign and domestic; that I will bear true faith and allegiance to the same; that I take this obligation freely, without any mental reservation or purpose of evasion; and that I will well and faithfully discharge the duties of the office on which I am about to enter. So help me God*). This is the official oath recited by members of the U.S. Senate at the beginning of Congress.²¹ Despite the Flynns’ uttering the words that denote U.S. Senators’ pledge to their duties, it is clear the Flynns did not claim to be U.S. Senators. Rather, it appears the Flynns used the Oath of Office for its pathos, and for its reference to the sacred values of the U.S. Constitution and the nation. This same attribution is also supported by the phrase “God Bless America” exclaimed by the Flynns at the very end of their backyard barbecue video. The disputed phrase, “where we go one we go all,” in concert with the Oath of Office and the “God Bless America” uttered by the Flynns, appears to have been intended to represent the Flynn’s patriotism, and an affirmation of unity with each other and the country.

In the absence of evidence of the Flynns’ beliefs in QAnon conspiracy theories, the only parsimonious interpretation of the intentions behind their utterance is their desire to express patriotism and family unity, not their allegiance to QAnon.

²¹ <https://www.senate.gov/about/origins-foundations/senate-and-constitution/oath-of-office.htm>.

IV. Compensation

I am being compensated at my hourly rate of \$400 for preparation of this report. My hourly rate for deposition and trial testimony is \$450. If I need to travel to testify, my hourly rate is \$500 per hour. To date, I have been paid an \$8,000 retainer. I am owed the additional sum of \$1,900.97 for work preparing this report.

Your very truly,

/s/ Sophia Moskalenko, Ph.D

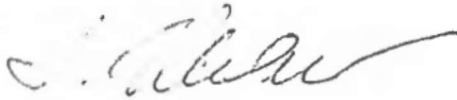
Dr. Sophia Moskalenko
smoskale@gmail.com

IV. Compensation

I am being compensated at my hourly rate of \$400 for preparation of this report. My hourly rate for deposition and trial testimony is \$450. If I need to travel to testify, my hourly rate is \$500 per hour. To date, I have been paid an \$8,000 retainer. I am owed the additional sum of \$1,900.97 for work preparing this report.

Your very truly,

/s/ Sophia Moskalenko, Ph.D.

A handwritten signature in black ink, appearing to read 'Sophia Moskalenko', with a long, sweeping horizontal line extending to the right.

Dr. Sophia Moskalenko
smoskale@gmail.com